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CLERK U.S. DISTRICT COUR-SOUTHERN DISTRICT OF IOWA

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF IOWA

DAVENPORT DIVISION

ROBERT W. KRAMER, III)
d/b/a CIS INTERNET SERVICES,)
)
Plaintiff,)
)
v.) Case No. 3:03 CV 80109
)
CASH LINK SYSTEMS, INC.;)
AMERIP.O.S., INC.;)
OTB PRODUCTS, LLC;)
AMP DOLLAR SAVINGS, INC.;)
AL GOLD; BOB F. BRESNAHAN;)
MONEYNEST HOLDINGS, INC.;)
JAMES McCALLA; DAMON)
DECRESCENZO; HEALTHSTOP, INC.	;)
MICHAEL MOEBECK; JOSEPH)
INGERSOLL; INTERNET SERVICES)
ZOCALO, INC.; GZ MEDIA, INC.)
TEI MARKETING GROUP, INC.;)
SAL SANTORO; JANET SMITH;)

42.

TOM SMITH; FRANK SPERRY;

NATIONAL CREDIT SYSTEMS, INC.;)

JERRY POOLE; CARMEN LYMAN;

BRIAN YOUNG; KEVIN HERTZ;

MIHIR TENEJA; and

JOHN DOES 29-300,

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT AS TO DEFENDANTS AMP DOLLAR SAVINGS, INC. AND TEI MARKETING GROUP, LLC

Plaintiff Robert W. Kramer, III d/b/a CIS Internet Services ("CIS") hereby requests that the Clerk of this Court enter the default of Defendant AMP Dollar Savings, Inc. ("AMP Dollar"), and TEI Marketing Group, LLC ("TEI Marketing") pursuant to Federal Rule of Civil Procedure 55 (a). Upon the clerk's entry of the defaults, CIS will then file a Motion for Default Judgment in accordance with Federal Rule of Civil Procedure 55 (b).

DEFENDANT AMP DOLLAR SAVINGS, INC.

AMP Dollar was served with a Summons, Complaint, and First Amended Complaint in this case on March 9, 2004. (See Exhibit A, Return of Service for AMP Dollar Savings, Inc.). Service was made on AMP Dollar's registered agent in the state of Arizona. Accordingly, AMP Dollar was required to file a responsive

pleading on or before March 29, 2004. No such pleading has been filed.

DEFENDANT TEI MARKETING GROUP, LLC

TEI Marketing was served with a Summons, Complaint, and First Amended Complaint in this case on April 5, 2004. (See Exhibit B, Return of Service for TEI Marketing Group, LLC).

Service was made on TEI's registered agent and director Ronald Scott at his current address. Accordingly, TEI Marketing was required to file a responsive pleading on or before April 26, 2004. No such pleading has been filed.

WHEREFORE Plaintiff CIS respectfully requests that the Clerk of this Court immediately enter the default of Defendants AMP Dollar Savings, Inc. and TEI Marketing Group, LLC.

Respectfully submitted this 16th day of June, 2004.

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THE WELLBORN FIRM, LLC

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Attorneys for Plaintiff CIS

UNITED STATES DISTRICT COURT

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MIHIR TENEJA; and)			
JOHN DOES 29-300,)			
)	CERTIFICATE	OF	SERVICE
Defendants.)			

CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the foregoing Request for Clerk's Entry of Default upon the below-identified by either U.S. first class mail addressed as follows or by hand (as indicated):

For Defendant AmeriP.O.S.:

John O. Moeller

601 Brady St., Suite 303

Davenport, IA 52803

For Defendant AMP Dollar Savings, Inc.:

Gary C. Brown, Registered Agent

6616 East Mountain View

Scottsdale, AZ 85253

For Defendant Bob F. Bresnahan:

2900 Banyan Street #405

Ft. Lauderdale, FL

For Defendant Brian Young:

1210 - 203rd St. E

Spanaway, WA 98937

For Defendant Cash Link Systems, Inc.:

Alan Levine, Registered Agent

10800 Biscayne Blvd, #600

Miami, FL 33161

For Defendant Damon DeCrescenzo:

5900 Collins Avenue, Unit 1508

Miami Beach, FL

For Defendant James McCalla:

7200 NW 179th St.

Apartment 310

Miami, FL 33011

For Defendant TEI Marketing:

Ronald Scott, Registered Agent

2480 Cypress Pond Road

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Palm Harbor, FL 34683

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